

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

<p>R2 Solutions LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>Deezer S.A.,</p> <p>Defendant.</p>	<p>Civil Action No. 4:21-cv-00090-ALM</p> <p>Jury Trial Demanded</p>
<p>R2 Solutions LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>Walmart Inc.,</p> <p>Defendant.</p>	<p>Civil Action No. 4:21-cv-00091-ALM</p> <p>Jury Trial Demanded</p>
<p>R2 Solutions LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>Charles Schwab Corp.,</p> <p>Defendant.</p>	<p>Civil Action No. 4:21-cv-00122-ALM</p> <p>Jury Trial Demanded</p>

R2 Solutions LLC,

Plaintiff,

v.

Civil Action No. 4:21-cv-00174-ALM

Jury Trial Demanded

JPMorgan Chase &amp; Co.,

Defendant.

**JOINT CLAIM CONSTRUCTION AND PRE-HEARING STATEMENT**

Pursuant to Patent Rule 4-3 and the Court’s scheduling order (Dkt. 22 in Case No. 4:21-cv-00090; Dkt. 30 in Case No. -00091; Dkt. 22 in Case No. -00122; *and* Dkt. 18 in Case No. -00174), Plaintiff R2 Solutions LLC (“R2” or “Plaintiff”) and Defendants Deezer S.A., Walmart Inc., Charles Schwab Corp., and JPMorgan Chase & Co. (collectively, “Defendants”) submit this Joint Claim Construction and Pre-Hearing Statement with respect to U.S. Patent No. 8,190,610 (“the ’610 patent”), U.S. Patent No. 8,341,157 (“the ’157 patent”), U.S. Patent No. 7,698,329 (“the ’329 patent”), U.S. Patent No. 8,209,317 (“the ’317 patent”), U.S. Patent No. 9,928,279 (“the ’279 patent”), and U.S. Patent No. 7,370,011 (“the ’011 patent”). The following table identifies with an “X,” which of the above patents R2 asserts against each of the Defendants:

<b>Case</b>	<b>’610 Patent</b>	<b>’157 Patent</b>	<b>’329 Patent</b>	<b>’317 Patent</b>	<b>’279 Patent</b>	<b>’011 Patent</b>
<i>R2 Solutions LLC v. Deezer SA</i> , 4:21-cv-00090	X	X	X	X	X	
<i>R2 Solutions LLC v. Walmart Inc.</i> , 4:21-cv-00091	X	X	X			
<i>R2 Solutions LLC v. JPMorgan Chase &amp; Co.</i> , 4:21-cv-00174	X					X
<i>R2 Solutions LLC v. The Charles Schwab Corporation</i> , 4:21-cv-00122	X					X

**Patent Rule 4-3(a)(1)**

The parties have not reached an agreement regarding construction of any claim terms, phrases, or clauses for the patents at issue.

**Patent Rule 4-3(a)(2)**

The parties hereby identify the following terms for construction in this case. The chart attached as Exhibit A provides Plaintiff's proposed constructions. The charts attached as Exhibit B, C, D, and E provide Deezer's, Walmart's, Charles Schwab's, and JPMorgan Chase's proposed constructions, respectively. Exhibits A-E contain an identification of the intrinsic and extrinsic evidence upon which each party intends to rely to support its proposed constructions for the terms listed here. Each party reserves the right to rely on any intrinsic or extrinsic evidence identified by the other party.

<u>Term #</u>	<u>Claim Term</u>
	<b><u>610 Patent</u></b>
1	“a plurality of mapping functions that are each user-configurable” (’610 Patent claims 1, 17, 33, 40)
2	“the first data group is mapped differently than the data of the second data group” (’610 Patent claims 1, 17)
3	“data set” (’610 Patent claims 1, 17, 33, 34, 40, 41)
4	“data group” (’610 Patent claims 1-2, 4, 17-18, 33, 40)
5	“data partition” (’610 Patent claims 1, 17, 33, 40)
6	“including processing the intermediate data for each data group in a manner that is defined to correspond to that data group, so as to result in a merging of the corresponding different intermediate data based on the key in common” (’610 Patent claim 1)
7	“at least one output data group is a plurality of output data groups” (’610 Patent claims 2, 18)
	<b><u>329 Patent</u></b>
1	“said data includes an abstract describing each document of said plurality of documents” (’329 Patent claims 4, 11)
2	“each document of said certain documents containing at least one <b>“section”</b> <b>“that is not used by said search engine”</b> for <b>“recall”</b> and <b>“one or more sections that are used by said search engine”</b> for recall” (’329 Patent claims 1, 8) (each phrase in quotation marks has a separate proposal for construction)
3	“wherein ranking a plurality of documents includes ranking said plurality of documents based, at least in part, on the at least one section of said certain documents not used by said search engine to recall documents” (’329 Patent claims 1, 8)
4	“for each respective <b>“abstract”</b> of each document of said certain documents, said abstract excludes terms from the respective <b>“at least one section not used by said search engine to recall said each document”</b> ” (’329 Patent claims 4, 11)
5	“document(s)” (’329 Patent claims 1, 4-5, 8, 11-12)
	<b><u>157 Patent</u></b>
1	“intent(s)” (’157 Patent claims 1-3)

2	“determining, at least the one computing device, a plurality of intents from the at least one keyword, each of the plurality of intents indicates a type of information regarding the query keyword that is likely to be desired by a user submitting the query” (’157 Patent claim 1)
3	“wherein the at least one intent comprises an unclassified intent” (’157 Patent claim 3)
4	“the query is classified by linguistic analysis of the at least one query keyword” (’157 Patent claim 5)
	<b><u>317 Patent</u></b>
1	“partial query” (’317 Patent claims 1, 2, 8, 12)
2	“query reconstruction server ... operative to receive a partial query submitted at a remote user client system ... and ... determine a full query ...” (’317 Patent claims 1, 2)
3	“... not fully representative of an entire search query desired by the user” (’317 Patent claims 1, 8)
4	“... better representative of the entire search query desired by the user.” (’317 Patent claims 1, 8)
	<b><u>279 Patent</u></b>
1	“streaming appliance computing device.” (’279 Patent claims 1, 2, 3, 7)
2	“single-action user input” (’279 Patent claims 1, 2, 3)
	<b><u>011 Patent</u></b>
1	“a link from a portal” (’011 patent claim 7)
2	“each link from the portal” (’011 patent claim 9)
3	“a user identification” (’011 patent claim 7)
4	“respective user identifications” (’011 patent claim 9)
5	“user-institution authentication data” (’011 patent claim 7 and 9)
6	“associating the user identification with the portal” (’011 patent claim 7)
7	“associating respective user identifications with the portal” (’011 patent claim 9)

**Patent Rule 4-3(a)(3)**

The parties respectfully request that the Court hear oral argument on claim construction. The parties request 120 minutes per side (4 hours total).

**Patent Rule 4-3(a)(4)**

At this time, neither Plaintiff nor Defendants intend to call any live witnesses at the claim construction hearing (should the Court decide to hold a hearing).

**Patent Rule 4-3(a)(5)**

At present, the parties are unaware of any additional issues that would require the scheduling of a pre-hearing conference prior to a Claim Construction Hearing.

**Patent Rule 4-3(b)**

At present, the parties do not intend to rely on expert testimony at this time but reserve the right to do so to respond to any claim construction position not disclosed in this Joint Claim Construction and Pre-Hearing Statement.

**Patent Scheduling Order – Number of Pages Needed to Brief the Disputed Terms**

The parties respectfully propose to consolidate claim construction briefing for the above cases such that opening, response, and reply briefs will each address all disputed terms for the six asserted patents. The parties agree that 75 pages is appropriate to address all disputed terms in Plaintiff's opening brief and that 75 pages is appropriate to address all disputed terms in Defendants' response brief. The parties also agree that 35 pages is appropriate for plaintiff's reply brief.

**Dated: September 28, 2021****Respectfully submitted,**

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**CERTIFICATE OF SERVICE**

On September 28, 2021, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Eastern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Edward R. Nelson III  
Edward R. Nelson III